

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HSBC BANK USA, NATIONAL)
ASSOCIATION, AS TRUSTEE FOR)
FREMONT HOME LOAN TRUST 2005-A,)
MORTGAGE-BACKED CERTIFICATES,) Case No. 1:12-cv-1786
SERIES 2005-A,)
Plaintiff,) Judge John Z. Lee
vs.)
AMY IMMERMAN,)
Defendant.)

Plaintiff's Motion for Entry of Judgment

Plaintiff, HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR
FREMONT HOME LOAN TRUST 2005-A, MORTGAGE-BACKED CERTIFICATES,
SERIES 2005-A (“Trustee”), respectfully moves for an entry of judgment pursuant to the
February 4, 2016 Court Order, and states as follows:

1. On March 11, 2012, the Trustee filed a Complaint to Foreclose Mortgage. [Dkt. 1].
2. On September 6, 2013, Immerman filed her answer, affirmative defense and counterclaim. [Dkt. 43].
3. On November 15, 2013, the Trustee filed its motion to strike affirmative defense and dismiss counterclaim. [Dkt. 61].
4. On July 15, 2014, this Court granted the Trustee’s motion to strike affirmative defense, but denied its motion to dismiss counterclaim. [Dkt. 72].

5. On March 20, 2015, the Trustee filed its motion for summary judgment on its foreclosure claim and Immerman's counterclaim. [Dkt. 90].

6. On October 15, 2015, this Court issued an order stating the Court will rule on the Trustee's motion for summary judgment without Immerman's response because the deadline for Immerman to file a response has expired. [Dkt. 112].

7. On February 4, 2016, this Court granted the Trustee's motion for summary judgment [Dkt. 115] and issued an order allowing the Trustee to file a motion for judgment along with supporting documents by February 17, 2016. [Dkt. 114].

8. This motion is made in compliance with the February 4, 2016 order. A proposed order will be submitted to the Court as required by the Court's standing order.

WHEREFORE, Plaintiff, HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR FREMONT HOME LOAN TRUST 2005-A, MORTGAGE-BACKED CERTIFICATES, SERIES 2005-A, respectfully requests that this Court enter judgment against Immerman and for all other relief this Court deems fair and just.

DATED: February 9, 2016

Respectfully submitted,

HSBC BANK USA, NATIONAL ASSOCIATION,
AS TRUSTEE FOR FREMONT HOME LOAN
TRUST 2005-A, MORTGAGE-BACKED
CERTIFICATES, SERIES 2005-A

By: /s/ Simon M. Feng
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, Simon M. Feng, an attorney, do hereby certify that on February 9, 2016, I electronically filed the foregoing with the Clerk of the Court using the electronic case filing system, which will send electronic notification of such filing to all parties that have appeared in this action.

By: /s/ Simon M. Feng